

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

JANE DOE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 6:20-cv-03217-DPR
	)	
JAY SENGER, in his official and	)	
individual capacities, BRAD DANIEL,	)	
Sheriff of Taney County, in	)	
his official capacity, JIMMIE RUSSELL,	)	
in his individual capacity, and	)	
TANEY COUNTY, MISSOURI,	)	
	)	
Defendants.	)	

**AMENDED NOTICE OF DEPOSITION DUCES TECUM**  
**OF PLAINTIFF'S EXPERT DR. DORA SCHRIRO**

YOU ARE HEREBY NOTIFIED that an oral deposition will be taken in the above-entitled cause as hereinafter set forth:

Place: via Zoom  
Alpha Reporting Service  
1911 S. National Ave., Suite 405  
Springfield, MO 65804

Date: **May 19, 2021**

Time: The deposition will begin at **9:00 a.m.** and continue so long as is necessary to complete it.

Witness to  
be Deposed: Dr. Dora Schriro

Court  
Reporter: Alpha Reporting Service

### **Materials To Be Produced**

1. The curriculum vitae or other documents that most accurately state, summarize or reflect the witnesses; education, experience, achievements, publications and other qualifications to provide expert testimony in this action.

2. The complete file created or maintained by or on behalf of the witness with respect to the witnesses; investigation, opinions, reports, anticipated testimony or other involvement in this action, including but not limited to the following:

- a. any and all documents, data, diagrams, drawings, photos, videos, reports or other tangible things furnished to the witness by any person relative to this case;
- b. any and all documents, data, diagrams, drawings, photos, videos, reports or other tangible things created by or on behalf of the witness relative to this case;
- c. any and all documents or data of any kind that the witness created, reviewed, referred to or relied upon in her investigation, or relied upon in arriving at her opinions or conclusions concerning the issues involved in this lawsuit, including but not limited to all scientific and technical articles, publications, codes, standards, regulations, specifications and other literature;
- d. any and all computer files, inputs and outputs, that were created, reviewed, used and/or relied upon in this case.
- e. Any and all e-mails received or generated and/or relied upon in this case.

- f. Notes made by you regarding any conversations with any person regarding this case,
3. Any and all demonstrative evidence or exhibits, including models, charts, diagrams, audio and visual presentations, that have been or will be prepared by or with the assistance of the witness or which may be utilized to assist the court or trier of fact in understanding all or any part of the witnesses' opinion or testimony.
4. Any and all documents which reflect or confirm the retention of the witness as an expert or consultant, the financial terms of the retention, or the scope of the witnesses' engagement in this case.
5. Any and all documents which reflect the times and dates worked, the duties, tasks or other services performed, offered, or requested, and the fees and costs billed or received relative to the witness or any agent or person working for or on behalf of the witness relative to this action.
6. A listing of any other cases (by case name, docket number and name of court) in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years, or any documents from which such information can readily be derived.
7. A case-by-case listing which details all payments made by or on behalf of Plaintiff or their counsel, to the witness, or to the witnesses' employer or service through which the witnesses' services were obtained, with respect to services or disbursements in this case.
8. All documents which reflect or relate to any statement or observation made by any alleged witness to the facts underlying this case which is relied on by the witness.

9. Any and all documents that reflect, relate to or embody any communication between the witness and any other person with respect to the case, the witnesses' opinions anticipated testimony, or the witnesses' investigation or research related thereto.

10. Any and all documents read, relied upon or used by the witness in preparation for this deposition, investigation any issue related to this matter, and/or preparing to give testimony at the trial of this action.

11. All documents that have been prepared, reviewed, consulted or relied upon by the deponent with respect to the deponent's investigation or in the formulation of any opinions or other testimony related to the subject matter of this action.

12. All memoranda, articles, abstracts, papers or other documents authored or edited by the deponent, in whole or in part, that relate to the subject matter of this action or the deponent's anticipated testimony.

13. Any video produced by you for in this case, including but not limited to any working drafts or final products.

14. Any and all reports prepared by you in this case, including all supplemental and corrected reports and the facts and data considered in forming the opinions set forth therein.

Respectfully submitted,

KECK & PHILLIPS, LLC

By /s/ Patricia A. Keck  
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*Attorneys For Defendants Daniel, Russell  
and Taney County, Missouri*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via CM-ECF efileing this 12<sup>th</sup> day of May, 2021, to:

John J. Ammann, Brendan D. Roediger & Susan McGraugh  
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/s/ Patricia A. Keck  
Patricia A. Keck